

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

CHRISTOPHER HUGHES,	)	CAUSE NO. 1:20-cv-01992
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
SPEEDWAY LLC,	)	
	)	
Defendant.	)	

**NOTICE OF REMOVAL**

Thomas L. Davis, counsel for defendant Speedway LLC, states:

1. On February 13, 2020, plaintiffs, Christopher Hughes and Shannon Hughes, filed their Complaint against defendant Speedway LLC in the Wayne County Superior Court of Indiana, under Cause No. 89D02-2002-CT-000007.

2. On July 7, 2020, an Order Dismissing Consortium Claim was approved the Honorable Gregory A. Horn, dismissing all claims as to Shannon Hughes with prejudice.

3. Speedway LLC is a Delaware limited liability company with its principal place of business in Ohio with a sole member, MPC Investment LLC. MPC Investment LLC is a Delaware limited liability company with its principal place of business in Ohio with a sole member, Marathon Petroleum Corporation. Marathon Petroleum Corporation is a Delaware corporation with its principal place of business in Ohio.

4. Plaintiff Christopher Hughes is a citizen of the state of Indiana.

5. The matter in controversy exceeds \$75,000.00, exclusive of interests and costs; this action does not arise under the Workmen's Compensation laws of any state; is not brought

against a common carrier or its receivers or trustees; does not arise under 45 U.S.C. §§ 51-60; and, therefore, this cause is removable to this Court under 28 U.S.C. § 1441(b).

6. This Notice of Removal is being filed with this Court within 30 days after receipt of paper (plaintiff's discovery responses) that this case is now applicable for removal to this Court under 28 U.S.C. § 1446(b)(3).

7. Copies of all process, pleadings, and orders served upon petitioner in the state court action are attached hereto. Promptly hereafter, written notice will be given to all adverse parties and to the Clerk of the Wayne Superior Court of Indiana, that this Petition for Removal is being filed with this Court.

WHEREFORE, defendant Speedway LLC prays that the entire state court action, under Cause No. 89D02-2002-CT-000007, now pending in the Wayne Superior Court of Indiana, be removed to this Court for all further proceedings.

FROST BROWN TODD LLC

By: /s/Thomas L. Davis

Thomas L. Davis, #4423-49  
Attorneys for Defendant

**CERTIFICATE OF SERVICE**

Service of the foregoing was made by placing a copy of the same into the United States

Mail, first class postage prepaid, this 30th day of July, 2020, addressed to:

David W. Craig  
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Christopher M. Barry  
Alexander R. Craig  
Samantha C. Craig Stevens  
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/s/Thomas L. Davis

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